

CAUSE NO. _____

IRENETTA HAWKINS § IN THE DISTRICT COURT OF
§
VS. § JEFFERSON COUNTY, TEXAS
§
STEVE SHARP TRANSPORTATION, INC., §
AND GREGORY DOLAN LARSON § _____ JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW IRENETTA HAWKINS, last three digits of Social Security Number are 974, hereinafter styled Plaintiff, complaining of STEVE SHARP TRANSPORTATION, INC., and GREGORY DOLAN LARSON, hereinafter styled Defendants and for cause of action would show unto the Court as follows:

I.

Discovery is intended to be conducted under Level 3 of Texas Rules of Civil Procedure 190.

II.

Plaintiff is a resident of Beaumont, Texas.

Defendant, STEVE SHARP TRANSPORTATION, INC., is a foreign corporation. Defendant does not maintain a designated agent for service of process in Texas. By reason thereof, Plaintiff invokes the provisions of Art. 17.044 of the Civil Practice & Remedies Code, which provides that the Secretary of State of the State of Texas is agent for service of process upon Defendant. Defendant may be served at its principal place of business: 260 E Main St., Cokeville, WY 83114.

Defendant, GREGORY DOLAN LARSON, is a resident of Florissant, Colorado and may be served with citation pursuant to Tex.R.Civ.P. 106(a)(2) by certified mail, return receipt requested at 5717 Empire Rd., Florissant, CO 80816.



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office
September 21, 2022

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 1 of 8

III.

Venue is proper in Jefferson County, Texas because a substantial part of the events or omissions giving rise to the claim occurred in said county.

IV.

Plaintiff would show that this action is brought to recover for the severe and personal injuries and damages incurred and suffered by Plaintiff and would specifically show that on or about September 18, 2020, Plaintiff was traveling southbound in the right lane on M.L. King Pkwy in Beaumont, Jefferson County, Texas, when Defendant Gregory Dolan Larson, while in the course and scope of his employment, as an agent, employee, or servant of the Defendant, Steve Sharp Transportation, Inc., suddenly and without warning disregarded the traffic device (“red light”) and collided with Plaintiff causing the collision in question. At the time of the collision, Defendant Gregory Dolan Larson was driving the vehicle that caused the collision. The vehicle that Defendant Gregory Dolan Larson was driving, was owned by Defendant Steve Sharp Transportation, Inc. Defendant Steve Sharp Transportation, Inc. gave permission to Defendant Gregory Dolan Larson to operate the motor vehicle, even though they knew him to be or should have known him to be a reckless driver and/or incompetent driver. Such negligence was the proximate cause of the collision subject of this suit, because the negligence of Defendant Gregory Dolan Larson, to whom the vehicle was entrusted was the proximate cause of the collision.

That as a result of said collision, Plaintiff sustained severe injuries to her back, neck, left shoulder and body generally as well as property damage.

The collision and all damages and injuries resulting therefrom, were not caused by or contributed to by Plaintiff nor did same occur through any fault or negligence on the part of the Plaintiff, but were caused solely by the acts, wrongs, and/or omissions of the Defendants, which



Witness my Hand and Seal of Office

September 21, 2022

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 2 of 8

said acts, wrongs and/or omissions were the proximate cause of the injuries and damages sustained by Plaintiff.

V.

At all times relevant to the allegations of this Petition, Defendant Gregory Dolan Larson had a duty to act as a reasonable and prudent commercial motor vehicle driver. Defendant Gregory Dolan Larson breached this duty and was negligent. His negligence was the sole and/or an aggregate proximate cause of this collision and Plaintiff's resulting injuries and damages. Defendant Gregory Dolan Larson's negligence includes, but is not limited to, the following:

- 1) Failing to operate a commercial vehicle in a reasonable manner;
- 2) Failing to maintain a proper lookout and pay attention to traffic around him;
- 3) Failing to recognize a potential hazard;
- 4) Failing to pay attention;
- 5) Disregarding red light;
- 6) Failing to brake in time;
- 7) Failing to take proper evasive action to avoid causing a wreck or making it less severe;
- 8) Negligence per se in violation of Section 545.151 of the Texas Transportation code; and
- 9) Such other and further acts of negligence as may be supplemented as a result of discovery performed in this suit.

All of the above acts, wrongs and/or omissions, as well as various other acts, wrongs, and/or omissions on the part of the Defendants amounted to negligence and were the proximate cause of the resulting damages and injuries suffered to and by the Plaintiff.



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

September 21, 2022

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 3 of 8

VI.

The accident described above and the ensuing damages and personal injuries sustained by Plaintiff was proximately caused by various acts, wrongs, and/or omissions on the part of the Defendants, and each and all of said acts, wrongs, and/or omissions amounted to negligence on the part of the Defendants.

VII.

As a result of the injuries Plaintiff sustained as a result of the accident made the basis of this suit, Plaintiff has incurred necessary hospital and medical expenses and will continue to incur medical expenses in connection with said injuries for an undetermined length of time in the future.

Plaintiff would further show that as a result of the negligence of the Defendants, and the injuries to Plaintiff caused solely by the said negligence of said Defendants, Plaintiff has experienced extreme physical pain, suffering, mental anguish, disfigurement and physical impairment; and, in all probability, will be forced to endure physical pain, suffering, mental anguish, disfigurement and physical impairment for an undetermined length of time in the future and probably for the rest of her life.

Plaintiff would further show that she was gainfully employed at the time of the incident in question and has suffered damages from loss of earnings and loss of earning capacity in the past and that her capacity to earn wages in the future has been substantially impaired and injured because of this incident.

VIII.

Plaintiff would show that the damages to be awarded herein is a matter lying largely, if not entirely, within the province of the Jury. In this regard, Plaintiff requests that the Jury award



September 21, 2022
JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS
Jamie Smith

Page 4 of 8

her fair and reasonable compensation for her damages. Based on the information currently available to Plaintiff, Plaintiff seeks monetary relief over \$200,000.00 but not more than \$1,000,000.00 to fairly and reasonably compensate her for her injuries, damages and losses.

Plaintiff also asserts a claim for prejudgment interest for all elements of damages that such interest is allowed for.

IX.
REQUEST FOR DISCLOSURE

Under the authority of Texas Rules of Civil Procedure 194, Plaintiff requests that, within thirty (30) days after the filing of the first answer or general appearance, Defendants disclose the information or material described in Rule 194.2(b).

X.
RULE 193.7 NOTICE

Plaintiff intends to use all Defendants' discovery responses as evidence at trial in accordance with such right and privileges established by Texas Rule of Civil Procedure 193.7.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that the Defendants be cited to appear and answer herein as the law directs, and that upon final hearing, Plaintiff has and recover judgment of and from the Defendants their items of damages, punitive damages, costs of court, and pre-judgment and post-judgment interest and that Plaintiff be entitled to such other and further relief, both at law and in equity, to which she may show herself justly entitled.



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

September 21, 2022

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 5 of 8

Respectfully submitted,

PROVOST★UMPHREY LAW FIRM, L.L.P.

350 Pine Street, Suite 1100

P.O. Box 4905

Beaumont, Texas 77704

(409) 835-6000

Fax: (409) 813-8605

By: 

SEAN VILLERY-SAMUEL

State Bar No. 24070802

svillery-samuel@pulf.com

ATTORNEYS FOR PLAINTIFF

JURY DEMAND

Plaintiff respectfully requests a trial by jury.



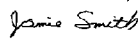
SEAN C. VILLERY-SAMUEL



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

September 21, 2022

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

 Page 6 of 8

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Genia Marks on behalf of Sean Villery-Samuel

Bar No. 24070802

gmarks@provostumphrey.com

Envelope ID: 67623071

Status as of 8/24/2022 2:53 PM CST

Associated Case Party: Irenetta Hawkins

Name	BarNumber	Email	TimestampSubmitted	Status
Sean Villery-Samuel		svillery-samuel@pulf.com	8/24/2022 2:45:46 PM	SENT



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

September 21, 2022

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 7 of 8

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Genia Marks on behalf of Sean Villery-Samuel

Bar No. 24070802

gmarks@provostumphrey.com

Envelope ID: 67623071

Status as of 8/24/2022 2:53 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Genia Marks		gmarks@pulf.com	8/24/2022 2:45:46 PM	SENT



I CERTIFY THIS IS A TRUE COPY
Witness my Hand and Seal of Office

September 21, 2022

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Jamie Smith Page 8 of 8